

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

PC CONNECTION, INC.,

Plaintiff,

v.

REBECCA WITTS,

Defendant.

No. 1:22-cv-00170-SE

**PC CONNECTION, INC. AND REBECCA WITTS’
JOINT MOTION FOR APPROVAL OF CONSENT ORDER**

Pursuant to Fed. R. Civ. P. (7)(b)(1), Plaintiff PC Connection, Inc. (“Connection”) and Defendant Rebecca Wits (“Ms. Wits”) hereby respectfully submit this Joint Motion for Approval of Consent Order. As grounds for the motion, Connection and Ms. Wits state as follows:

1. Connection commenced this action on May 13, 2022 against Defendants Rebecca Wits and Clutch Solutions, LLC alleging breach of contract and tortious interference with contractual relations. On June 7, 2022, Connection filed a First Amended Complaint as of right, which is the operative pleading in this matter. On August 2, 2022, the Court allowed the voluntary dismissal of Clutch Solutions, LLC as a defendant. On August 23, 2022, Ms. Wits filed an answer and counterclaims against PC Connection, Inc.
2. Connection’s First Amended Complaint alleges that Ms. Wits breached her restrictive covenant agreement between herself and Connection.
3. As a result of having engaged in settlement negotiations, Connection and Ms. Wits agreed to resolve this action in its entirety as against Ms. Wits and consent to the entry of

the attached Proposed Consent Order, attached hereto as Exhibit A. The attached Proposed Consent Order reflects the terms of the injunctive relief to which Connection and Ms. Witts have agreed after contemplating the specific facts of the First Amended Complaint. In so submitting this Motion for Approve of Consent Order, Ms. Witts is not admitting to or acknowledging the facts in the First Amended Complaint or to the claims asserted against Ms. Witts in the First Amended Complaint.

4. Connection and Ms. Witts request that the Court approve and execute the attached Proposed Consent Order. The Proposed Consent Order conforms to Fed. R. Civ. P. 65(d) in that it states the reason why it is issued, provides specific terms that Connection and Clutch must comply with, and describes in detail the acts restrained and required.
5. The entry of the Proposed Consent Order will resolve this litigation.

Respectfully submitted,

PC CONNECTION, INC.

By its attorneys,

Dated: November 16, 2022

/s/ Samuel H. Martin
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AND

REBECCA WITTS

By her attorneys,

DONAHUE, TUCKER & CIANDELLA, PLLC

Dated: November 16, 2022

By /s/ Eric A. Maher

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CERTIFICATE OF SERVICE

This hereby certifies that on this 16th day of November, 2022, this document was filed through the ECF system. A copy was sent via ECF to all counsel of record.

/s/ Samuel H. Martin

Samuel H. Martin